

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK**

In re: The Roman Catholic Diocese of
Syracuse, New York,

Debtor.

Case No. 20-30663 (WAK)

Chapter 11

**THE NATIONAL CATHOLIC RISK RETENTION GROUP, INC.'S (I) LIMITED
OBJECTION TO THE APPROVAL OF FOURTH AMENDED DISCLOSURE
STATEMENT AND (II) JOINDER IN CERTAIN INSURERS' OBJECTIONS TO
APPROVAL OF THE FOURTH AMENDED DISCLOSURE STATEMENT**

The National Catholic Risk Retention Group, Inc. (“TNCRRG”) hereby (1) asserts its limited objection (“Limited Objection”) to the Debtor’s *Disclosure Statement in Support of Fourth Amended Joint Chapter 11 Plan of Reorganization for The Roman Catholic Diocese of Syracuse, New York* dated September 13, 2024 [Docket No. 2173] (the “Current Disclosure Statement”) and (2) joins in the objections (the “Joinder”) filed by: Certain Underwriters at Lloyd’s, London, and London Market Companies on October 18, 2024 [Docket No. 2258] and Interstate Fire & Casualty Company and Fireman’s Fund Insurance Company, Certain Underwriters at Lloyd’s, London, and London Market Companies, and Hartford Fire Insurance Company on October 18, 2024 [Docket No. 2260] to the Current Disclosure Statement (collectively, the “Objections”) and adopts the arguments set forth in the Objections as if they were more fully set forth in this Limited Objection. For the reasons set forth in the Objections, TNCRRG requests that the Court deny approval of the Current Disclosure Statement.

TNCRRG frames this objection as a “limited objection” because it had reached settlement with the Debtor and other key parties (the “Settlement”). The Settlement, however, has not been fully documented to date. TNCRRG therefore files this Limited Objection and Joinder out of abundance of caution so as to preserve its rights in the event the Settlement is not consummated.

Dated: October 18, 2024

WOMBLE BOND DICKINSON (US) LLP

/s/ Edward L. Schnitzer

Edward L. Schnitzer

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*Counsel for The National Catholic Risk
Retention Group, Inc.*

CERTIFICATE OF SERVICE

I, Edward L. Schnitzer, do hereby certify that on October 18, 2024, I caused a copy of the **The National Catholic Risk Retention Group, Inc.’s (I) Limited Objection to the Approval of Fourth Amended Disclosure Statement and (II) Joinder in Certain Insurers’ Objection to Approval of the Fourth Amended Disclosure Statement** to be served on those persons who have formally appeared and requested service in this case pursuant to Rule 2002 of the Federal Rules of Bankruptcy Procedure via CM/ECF and on the parties listed on the attached service list via CM/ECF and First-Class Mail.

/s/ Edward L. Schnitzer

Edward L. Schnitzer

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